IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X

JOHN P. "JACK" FLYNN LESLIE A. FLYNN

Plaintiffs,

v. : <u>Case 1:21-cv-02587-GHW</u>

CABLE NEWS NETWORK, INC.

Defendant.

-----X

## MOTION FOR ADMISSION PRO HAC VICE OF STEVEN S. BISS, ESQUIRE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiffs JOHN P. "JACK" FLYNN and LESLIE A. FLYNN in the above-captioned action.

I am a member in good standing of the Bar of the Commonwealth of Virginia, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been disbarred or denied admission or readmission by any court.

Attached as *Exhibit "A"* is a Certificate of Good Standing issued by the Supreme Court of Virginia.

Attached as *Exhibit "B"* is my Affidavit pursuant to Local Rule 1.3.

Attached as *Exhibit* "C" is the text of a proposed Order.

WHEREFORE, for the reasons stated above, I respectfully move the Court to grant this motion.

DATED: May 12, 2021

## /s/ Steven S. Biss

STEVEN S. BISS, ESQUIRE Virginia State Bar No. 32972 300 West Main Street, Suite 102 Charlottesville, Virginia 22903 Telephone: (804) 501-8272

Facsimile: (202) 318-4098

Email: <u>stevenbiss@earthlink.net</u>